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Sanitary and Veterinary Rules for Seafood Testing

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Fishery Products

Approved By:

Mary Ellen Smith

Prepared By:

Marina Muran

Report Highlights:

On April 28, 2009, Ministry of Agriculture Order #462 regarding Rules for Veterinary and Sanitary Laboratory Testing of Fish and Caviar entered into force. The objective of the order is to monitor and set more rigid control over safety of fish and caviar, as well as address the government plan to eliminate administrative barriers. However, trade sources believe that the ambiguity of the order provides room for more corruption. The sector also requested that DPM Viktor Zubkov address the issue during the next Government Commission on development of the fishery sector.

General Information:

Author Defined:

Summary of the Document

On April 28, 2009, Order # 462 regarding Rules for Veterinary and Sanitary Laboratory Testing for Fish and Caviar came into force. The full text of the document in Russian can be viewed at:

<http://www.rg.ru/2009/04/17/ikra-ekspertiza-dok.html>

The Order provides rules for veterinary testing for all types and species of fish: wild fish or farmed fish and caviar. According to the order, fish and caviar are subject to veterinary and sanitary laboratory testing with the objective of determining, whether products are fit for human consumption, as well as for fish farming, reproduction and acclimatization.

Fish or caviar are considered safe if the product is in compliance with requirements for organoleptic, chemical, and radiological indicators, and if it does not exceed containment levels of microorganisms and other biological organisms that pose threat to human and animal health. Indicators and levels of microbiological containment are set in Sanitary Epidemiological rules and Norms SanPiN 2.3.2.1078-01 enacted by Decree # 36 dated November 14, 2001, signed by the Chief State Sanitary Doctor of the Russian Federation.

The laboratory testing for microbiological, toxicological results takes place in case of uncertainty of the safety of fish or caviar, or when characteristic signs are obvious as indicated in the attachment to the Order.

The safety of fish and seafood is confirmed when carrying out veterinary and sanitary testing of shipment of fish or caviar. The document defines shipment as “the certain amount of product of the same product range, type of processing, one or several dates of production, one producer, filed in one document that certifies quality and safety”. For example, a shipment of live fish should consist of fish species of one or several names (cod, Pollock, haddock, etc.) of one group on length and weight, placed in one transport unit (containers, tanks capacity, railcars for live fish etc.).

Upon the results of laboratory testing, the veterinary document is issued for a shipment. In case the results of testing indicate that fish or caviar is not safe for human consumption, the product is sent for disposal and/or destruction.

The Provisions of the document comprise of detailed description of the following rules:

- 1/ Veterinary Sanitary laboratory testing of fresh fish;
- 2/ Veterinary Sanitary testing of fish infected with invasion diseases;
- 3/ Veterinary Sanitary testing of chilled fish;
- 4/ Veterinary Sanitary testing of fresh frozen fish;
- 5/ Veterinary Sanitary testing of salted fish;
- 6/ Veterinary Sanitary testing of dried and smoked fish;
- 7/ Veterinary Sanitary testing of fish affected by pests;
- 8/ Veterinary Sanitary testing of caviar.

The attachment of the Order provides full description of infectious diseases of fish, their typical characteristics and various ways to use the product. The description of diseases includes infectious

necrosis of hematopoietic salmon tissues, epizootic ulcerous syndrome of salmon species, *Oncorhynchus masou* etc.

Comments

Trade sources report that the Order has raised contradictions and discontent within the fishery industry. Paragraph 50 of the rules declares that samples of no less than 5 percent are to be taken for lab sampling from each shipment of fish and caviar. Specialists say that the sampling quantity is exceeding the quantity factually needed for testing and that surpluses from sampled caviar can be used as a tool for personal profit of Veterinary officials. According to the representative of the Association of Pollock Fishermen, the MinAg order contradicts directly with the Plan for anti-crisis measures approved by the Russian government. It is reported that the fishermen prompted DPM Viktor Zubkov to address the current situation at the next Government commission on development of fishery industry.

Although the order is envisaged to monitor and set more rigid control over safety of fish and caviar and to address government plans to eliminate administrative barriers, the ambiguity of the order leaves room for stimulating corruption. According to the same source 10,000 metric tons per year are expected to be withdrawn from fishermen for sampling, while the Association of Pollock Fishermen estimates up to 35,000 metric tons of Pollock per year for testing, and the Association of fishery companies on Ust-Kamchatka region estimates about 25,000 metric tons of caviar per year for testing.

Fishermen also strongly believe that sampling regarding health and safety of marine fish should be implemented before setting Total Allowable Catch (TAC) and quota distribution among fishing companies by monitoring zones for harvesting. According to specialists, it is more efficient to apply the current rules to fish breeding facilities only.

According to trade sources, while Veterinary Service intention is to strengthen control over food safety, the implementation of the rules will drive up prices of fish and seafood in the local retail market and once again average consumer will be affected.